

FREEDMAN AND LORRY, P.C.
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOHN I. MOORE	:	CIVIL ACTION
	:	
and	:	
	:	
DIANNA L. MOORE	:	
	:	
v.	:	
	:	
SAFEGUARD STORAGE PROPERTIES,	:	
LLC	:	
	:	NO.

COMPLAINT

Jury Trial Demanded

1. Plaintiffs, John I. Moore and Dianna L. Moore are citizens and residents of the Commonwealth of Pennsylvania and at all times relevant hereto have been husband and wife.
2. Defendant Safeguard Storage Properties, LLC is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business located at 3350 Peachtree Road, N.E. Suite 1700, Atlanta Georgia 30326.

3. The jurisdiction of this Court is invoked under 28 U.S.C., § 1332, there being diversity of citizenship between the parties and the amount in controversy, exclusive of interest and costs, being in excess of seventy-five thousand dollars (\$75,000.00).

4. On or about October 24, 2007, and at all time material hereto, Defendant owned and or leased, managed, operated, possessed and controlled a public storage facility located at 830 Hunting Park Avenue, Philadelphia, PA 19124.

5. Venue is appropriate in this Court since a substantial part of the events giving rise to the claim occurred within this judicial district.

6. At all times material hereto, Defendant was under a duty to keep the floors in the aforescribed public storage facility clear of slippery substances and otherwise safe for the use of business visitors thereto.

7. On or about October 24, 2007, at approximately 9:35 a.m. the Plaintiff John I. Moore was a business visitor at the aforescribed public storage facility.

8. On or about October 24, 2007, at approximately 9:35 a.m. the Plaintiff John Moore was walking in the aforescribed public storage building, when, because of the carelessness and negligence of the Defendant, by its agents, servants, workmen and employees, he was caused to slip and fall and sustain the injuries which are the subject of this action.

**CLAIM OF PLAINTIFF JOHN I. MOORE AGAINST DEFENDANT
SAFEGUARD STORAGE PROPERTIES LLC**

9. Plaintiffs repeat and reallege each and every allegation set forth in Paragraphs 1 through 8 hereof, as if fully set forth herein.

10. By reason of the carelessness and negligence of Defendant Safeguard Storage Properties, LLC, by its agents, servants, workmen and employees, the Plaintiff John I. Moore

was caused to sustain injuries to his cervical and lumbar spines and the discs thereof, the full extent of which has not yet been determined, he was caused to sustain injuries to his left shoulder and left arm, the full extent of which have not yet been determined; he sustained other orthopedic, neurological and internal injuries; he sustained arthritic and vascular changes; he sustained severe shock and injury to his nerves and nervous system; he has in the past required and may in the future continue to require medicines, medical care and attention; he has in the past been and may in the future be compelled to expend monies and incur obligations for such care and attention; he has in the past suffered and may in the future continue to suffer agonizing aches, pains and mental anguish; he has in the past been and may in the future continue to be disabled from performing his usual duties, occupations and avocations.

WHEREFORE, Plaintiff John I. Moore claims of the Defendant Safeguard Storage Facility Properties, LLC a sum in excess of Seventy Five Thousand Dollars (\$75,000.00), together with interest and costs, and brings this action to recover same.

**CLAIM OF PLAINTIFF DIANNA L. MOORE AGAINST
DEFENDANT SAFEGUARD STORAGE PROPERTIES, LLC**

11. Plaintiffs repeat and reallege each and every allegation set forth in Paragraphs 1 through 8 as if fully set forth herein.

12. By reason of the carelessness and negligence of Defendant Safeguard Storage Properties, LLC, by its agents, servants workmen and employees, and the resulting injuries suffered by the Plaintiff John I. Moore, the Plaintiff Dianna L. Moore has been and will in the future be deprived of the assistance, society, companionship, comfort and consortium of her husband, the Plaintiff John I. Moore, to her detriment and loss.

WHEREFORE, Plaintiff Dianna L. Moore claims the Defendant Safeguard Storage Facility Properties, LLC a sum in excess of Seventy Five Thousand Dollars (\$75,000.00), together with interest and costs, and brings this action to recover same.

FREEDMAN AND LORRY, P.C.

By: _____ /S/
STANLEY B. GRUBER, ESQUIRE
Attorneys for Plaintiffs

Dated: September 21, 2009